

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

**CASE NO. 0:25-cv-60630-LEIBOWITZ CASE NO. 0:25-cv-60646-LEIBOWITZ CASE
NO. 0:25-cv-60647-LEIBOWITZ CASE NO. 0:25-cv-60712-LEIBOWITZ**

BYOPLANET INTERNATIONAL, LLC,

Plaintiff,

v.

PETER JOHANSSON and CHARLES GILSTRAP,

Defendant.

_____ /

BYOPLANET INTERNATIONAL, LLC,

Plaintiff,

v.

JARRED KNECHT,

Defendant.

_____ /

**NOTICE REGARDING DISPUTED FEE AMOUNTS AND PROPOSED PAYMENT
PLAN**

Undersigned counsel, hereby provides this notice to the Court pursuant to the Court's Order dated July 17, 2025 [ECF No. 33], and states as follows:

1. Pursuant to the Court's Order imposing sanctions for the improper use of artificial intelligence-generated authorities in the above-captioned matters, undersigned counsel has reviewed the attorney fee submissions provided by counsel for Defendants Charles Gilstrap and Jarred Knecht.

2. Undersigned counsel has made good faith efforts to confer with opposing counsel regarding the reasonableness and accuracy of the submitted billing entries. However, undersigned counsel has identified numerous disputed entries that are either unrelated to the sanctioned conduct or represent duplicative, excessive, or administrative billing that should be excluded or substantially reduced. Pursuant to this Court's July 24, 2025, deadline counsel for Knecht, did meet and confer in good faith to discuss the disputed amounts. *See Exhibit A.*
3. Based on the review of Knecht's attorneys' fees, undersigned counsel determined that a reduction of \$29,900.50 from the \$54,661.50 proposed total fees was appropriate. Additionally, based on the review of Gilstrap's attorneys' fees, undersigned counsel determined that a reduction of \$26,834.00 of the 48,804.00 proposed total fees was appropriate. Pursuant to this Court's July 24, 2025, deadline counsel for Gilstrap, did meet and confer in good faith to discuss the disputed amounts. *See Exhibit B.*
4. As reflected in the email exchanges between undersigned counsel and opposing counsel for Knecht, the parties were unable to reach a mutual agreement on the amount of fees attributable to the sanctioned conduct by the June 24, 2025, deadline imposed by the Court. However, Counsel for Gilstrap, failed to respond to undersigned counsel's last email on July 23, 2025, to Counsel for Gilstrap, revealing its proposed reduced amount of fees, thus negating the Court's imposed deadline to "agree upon the reasonable attorney fees."
5. Given the fact that undersigned counsel is a solo practitioner who currently represents a single client in this matter and has not been compensated for his services to date. In light of his limited financial resources and the extraordinary amount of fees sought, undersigned

counsel respectfully advises the Court that he is only able to pay a total of \$20,000 toward the sanctions.

6. Undersigned counsel proposes to satisfy this obligation through a structured payment plan of \$4,000 per month over five (5) months, beginning August 15, 2025, and continuing on the first day of each month thereafter through December 15, 2025. Undersigned counsel asks this Court for its leniency in this request, as the above-referenced proposal would be the largest sanctions paid out for the use of AI generative case law to date. *See Exhibit C.*
7. Undersigned counsel submits this proposed payment plan in good faith and respectfully requests that the Court approve this plan in consideration of his present financial condition and demonstrated willingness to comply with the Court's Order.

Dated: July 25, 2025

Respectfully submitted,

/s/James Paul

James M. Paul, Esq
Florida Bar No.: 1010819
JUSTICE LAW GROUP, LLP
850 Southeast 8th Avenue
Fort Lauderdale, Florida 33316
Tel: (917) 562-9607
Email: jpaul@justicelawgroup.ai

EXHIBIT A



Re: Attorney Fees Analysis

From James M. Paul, Esq. <Jpaul@justicelawgroup.ai>

Date Thu 7/24/2025 6:01 PM

To Jeffrey Bast <JBast@bastamron.com>

Cc Tanisha Wright <twright@bastamron.com>; Maria Desvergunat <mdesvergunat@bastamron.com>

Jeff,

Duly noted. My position is that we move forward with notices tomorrow.

Thank you.

James M. Paul, Esq.

Justice Law Group, LLP

850 Southeast 8th Avenue

Fort Lauderdale, FL33316

Email: Jpaul@justicelawgroup.ai

Phone: 917-562-9607

From: Jeffrey Bast <JBast@bastamron.com>

Sent: Thursday, July 24, 2025 5:28 PM

To: James M. Paul, Esq. <Jpaul@justicelawgroup.ai>

Cc: Tanisha Wright <twright@bastamron.com>; Maria Desvergunat <mdesvergunat@bastamron.com>

Subject: Re: Attorney Fees Analysis

James, In accordance with the Court's directive, I am enclosing my responses to your objections, line by line. You will see that I have agreed to the majority of your objections. Only nine entries remain in dispute. I have highlighted those entries in yellow. Based on the below, however, I understand you are no longer willing to discuss this matter. Unless you direct otherwise this evening, my intention will be to file my notice of dispute tomorrow. Jeff



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From: "James M. Paul, Esq." <Jpaul@justicelawgroup.ai>

Date: Thursday, July 24, 2025 at 4:23 PM

To: JEFFREY BAST <JBast@bastamron.com>

Cc: Tanisha Wright <twright@bastamron.com>, Maria Desvergunat <mdesvergunat@bastamron.com>

Subject: Re: Attorney Fees Analysis

Jeff,

I had a chance to speak with my client. At this point, we will leave it up to what the court and file our notices respectively by the 25th.

James M. Paul, Esq.

Justice Law Group, LLP

850 Southeast 8th Avenue

Fort Lauderdale, FL33316

Email: Jpaul@justicelawgroup.ai

Phone: [917-562-9607](tel:917-562-9607)

From: Jeffrey Bast <JBast@bastamron.com>

Sent: Thursday, July 24, 2025 2:24 PM

To: James M. Paul, Esq. <Jpaul@justicelawgroup.ai>

Cc: Tanisha Wright <twright@bastamron.com>; Maria Desvergunat <mdesvergunat@bastamron.com>

Subject: Re: Attorney Fees Analysis

Are you proposing \$10,000 per month until the balance you proposed \$29,900.50 is paid off? Perhaps we should jump on a call given the deadline. 2:45?



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From: "James M. Paul, Esq." <Jpaul@justicelawgroup.ai>
Date: Thursday, July 24, 2025 at 1:55 PM
To: JEFFREY BAST <JBast@bastamron.com>
Cc: Tanisha Wright <twright@bastamron.com>, Maria Desvergunat <mdesvergunat@bastamron.com>
Subject: Re: Attorney Fees Analysis

Jeff,

Sorry for the confusion in my last email. What I meant to say is that I cannot currently afford to pay the amount that I proposed, let alone your counteroffer. However, what I am willing to offer and if accepted by your client would be a payment of \$10,000 paid within 30 days of the filed joint notice.

James M. Paul, Esq.
Justice Law Group, LLP
850 Southeast 8th Avenue
Fort Lauderdale, FL33316
Email: Jpaul@justicelawgroup.ai
Phone: [917-562-9607](tel:917-562-9607)

From: Jeffrey Bast <JBast@bastamron.com>
Sent: Thursday, July 24, 2025 12:44 PM
To: James M. Paul, Esq. <Jpaul@justicelawgroup.ai>
Cc: Tanisha Wright <twright@bastamron.com>; Maria Desvergunat <mdesvergunat@bastamron.com>
Subject: Re: Attorney Fees Analysis

James, Are you now saying that you will not agree to any amount, even what you previously proposed? I am asking because we have been ordered to attempt in good faith to agree on an amount and a payment schedule. I want to be sure to comply with the court's directive. If we are unable to agree then we must each file a notice stating the nature of the dispute and our respective positions. Please confirm your position or let me know if it will be productive to get back on the phone/zoom. Thanks.



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From: "James M. Paul, Esq." <jpaul@justicelawgroup.ai>
Date: Thursday, July 24, 2025 at 12:32 PM
To: JEFFREY BAST <JBast@bastamron.com>
Cc: Tanisha Wright <twright@bastamron.com>, Maria Desvergunat <mdesvergunat@bastamron.com>
Subject: Re: Attorney Fees Analysis

Jeff,

Unfortunately, Jeff. I cannot agree to this amount. As we discussed, I am solo practitioner, that can't afford to pay this amount, let alone the amount I reduced it to.

So, at this point, I say we move forward with a joint notice to file with the court.

James M. Paul, Esq.
Justice Law Group, LLP
850 Southeast 8th Avenue
Fort Lauderdale, FL33316
Email: jpaul@justicelawgroup.ai
Phone: [917-562-9607](tel:917-562-9607)

From: Jeffrey Bast <JBast@bastamron.com>
Sent: Wednesday, July 23, 2025 5:02 PM
To: James M. Paul, Esq. <Jpaul@justicelawgroup.ai>
Cc: Tanisha Wright <twright@bastamron.com>; Maria Desvergunat <mdesvergunat@bastamron.com>
Subject: Re: Attorney Fees Analysis

James, The attached shows that your objections, as adjusted by your email below, propose a reduction of our fees from \$54,661.60 down to \$29,900.50. This amount is 54.7% (a 45.3% reduction) of the total fees requested. In an effort to resolve this prior to tomorrow's deadline, I am authorized to accept 75% (a 25% reduction) of the amount requested. This amounts to \$40,996.13. If this amount is acceptable, please confirm your agreement and let me know if 14 days to pay will work for you. We will then prepare a Joint Notice to file with the Court. Thanks, Jeff



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From: "James M. Paul, Esq." <Jpaul@justicelawgroup.ai>
Date: Wednesday, July 23, 2025 at 2:16 PM
To: JEFFREY BAST <JBast@bastamron.com>
Cc: Tanisha Wright <twright@bastamron.com>, Maria Desvergunat <mdesvergunat@bastamron.com>
Subject: Re: Attorney Fees Analysis

Jeff,

As we discussed, I agree to the four entries relating to the supplemental brief, as this directly is related to response to AI generative cases/pleadings.

Thank you.

James M. Paul, Esq.

Justice Law Group, LLP

850 Southeast 8th Avenue

Fort Lauderdale, FL 33316

Email: Jpaul@justicelawgroup.ai

Phone: [917-562-9607](tel:917-562-9607)

From: Jeffrey Bast <JBast@bastamron.com>

Sent: Wednesday, July 23, 2025 9:25 AM

To: James M. Paul, Esq. <Jpaul@justicelawgroup.ai>

Cc: Tanisha Wright <twright@bastamron.com>; Maria Desvergunat <mdesvergunat@bastamron.com>

Subject: Re: Attorney Fees Analysis

Jame, We are reviewing this and expect to respond later today, but you included objections to 4 of the entries on 6/23, 6/24, and 6/25 related to supplemental briefing. You asked, "supplemental briefing of which matter?" This was the supplement brief ordered by Judge Leibowitz following the Order to Show Cause hearing. Please confirm that this clarifies or eliminates the basis for your objections to these entries and that you therefore agree to them. Thanks. Jeff



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From: "James M. Paul, Esq." <Jpaul@justicelawgroup.ai>

Date: Tuesday, July 22, 2025 at 5:55 PM

To: JEFFREY BAST <JBast@bastamron.com>

Cc: Tanisha Wright <twright@bastamron.com>, Maria Desvergunat <mdesvergunat@bastamron.com>

Subject: Attorney Fees Analysis

Jeff,

As we discussed yesterday, please find my responses to your attorney fees as it relates to the AI generative case law responses.

James M. Paul, Esq.

Justice Law Group, LLP

850 Southeast 8th Avenue

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Date	Timekeeper	Description	Time	Rate	Fee	Plaintiff Objection/Agreed	Plaintiff Proposed		Defendant Reply	Defendant Proposed	
5/6/2025	JB	Correspondence with counsel for defendants regarding insufficiency of Fact Information Sheet, request for production; correspondence with client regarding same; research regarding cases cited by counsel	0.9	\$825.00	\$742.50	Objection - entry should be limited to "research regarding cases cited by counsel" - reduced to: .40	0.4	\$330.00	Agree	0.4	\$330.00
5/7/2025	JB	Correspondence with counsel for defendants regarding Fact Information Sheet, production requirements	0.4	\$825.00	\$330.00	Objection - this entry has nothing to do with AI generative response. Reduce to .00.	0	\$0.00	Agree	0	\$0.00
5/8/2025	KT	Prepare ECI's reply in support of its motion to dismiss; research and analyze caselaw to regarding same; review ECI's motion to dismiss and Plaintiff's response in opposition	4.8	\$285.00	\$1,368.00	Objection - this motion to dismiss would have occurred whether AI generative cases were used or not. - Reduce to .00.	0	\$0.00	Agree	0	\$0.00
5/8/2025	JB	Correspondence with J. Paul regarding Fact Information Sheet, Requests for Production; analysis of cases cited; correspondence with client group regarding same; correspondence with counsel regarding hearing on motion for protective order, deposition; review and revise motion to compel Fact Information Sheet and production	2.3	\$825.00	\$1,897.50	Objection - this entry does not entirely have to do with responses to AI generative filings. Reduce amount proportionate to AI generative cases. Reduce to 1.60.	1.6	\$1,320.00	Agree	1.6	\$1,320.00
5/9/2025	JB	Correspondence with J. Paul re hearing on motion for protective order, deposition	0.3	\$825.00	\$247.50	Objection - simple correspondence not in direct response to Motion for Protective Order. Reduce to .00.	0	\$0.00	Agree	0	\$0.00
5/9/2025	MD	Review hearing dates for hearing on motion for protective order; initial draft of response to motion for protective order	0.8	\$275.00	\$220.00	Agreed	0.8	\$220.00		0.8	\$220.00
5/11/2025	JB	Correspondence with client group regarding motion for protective order; correspondence with defendants' counsel regarding hearing, deposition	0.4	\$825.00	\$330.00	Objection - discussion relating to Motion for Protective Order, not a response to AI generated cases. Reduction to .00.	0	\$0.00	Agree	0	\$0.00
5/12/2025	MD	Review correspondence with opposing counsel regarding motion for protective order; prepare and file notice of hearing regarding same; submit courtesy copies of motion and notice of hearing to chambers	0.4	\$275.00	\$110.00	Agreed	0.4	\$110.00		0.4	\$110.00
5/14/2025	MD	Review judge's procedures regarding response to motion for protective order	0.3	\$275.00	\$82.50	Objection - not a response to an AI generative pleading. Reduced to .00.	0	\$0.00	Agree	0	\$0.00
5/14/2025	JB	Work on response to motion for protective order, including review of all cases cited by O'Shea, including fabricated cases	2.6	\$825.00	\$2,145.00	Objection - double billing. Reduced to a total of 2.00 from a combine 3.90 between JB and TMW.	1	\$825.00	Agree	1	\$825.00
5/14/2025	TMW	Review and revise response to motion for protective order	1.3	\$305.00	\$396.50	Objection - double billing. Reduced to a total of 2.00 from a combine 3.90 between JB and TMW.	1	\$305.00	Agree	1	\$305.00
5/15/2025	MD	Compile exhibits to response to motion for protective order and finalize and file motion for protective order	1.1	\$275.00	\$302.50	Objection - administrative task - reduce to 0.0.	0	\$0.00	Agree	0	\$0.00
5/15/2025	JB	Review client comments to response to motion for protective order; review and finalize same for filing	0.4	\$825.00	\$330.00	Agreed.	0.4	\$330.00		0.4	\$330.00
5/15/2025	TMW	Review and revise response to motion for protective order	1.2	\$305.00	\$366.00	Objection - Double billing from previous entry. Reduced to .50	0.5	\$152.50	Agree	0.5	\$152.50
5/16/2025	MD	initial preparation of hearing materials for motion for protective order	0.3	\$275.00	\$82.50	Agreed.	0.3	\$82.50	Agree	0.3	\$82.50
5/18/2025	KT	Begin preparing response brief in opposition to appeal	4	\$285.00	\$1,140.00	Objection - Response brief would be filed regardless of AI generative responses. Reduce to .00.	0	\$0.00	Agree	0	\$0.00

5/19/2025	KT	Continue preparing response brief in opposition to appeal	2.6	\$285.00	\$741.00	Objection - Response brief would be filed regardless of AI generative responses. Reduce to .00.	0	\$0.00	Agree	0	\$0.00
5/19/2025	MD	Calendar reply deadline to file reply in support of J. Knecht's motion to dismiss; pull caselaw in support of Promark's response to motion for protective order	0.7	\$275.00	\$192.50	Agreed.	0.7	\$192.50		0.7	\$192.50
5/19/2025	JB	Begin review and revision to ECI reply in support of motion to dismiss; correspondence with team regarding J. Knecht reply	0.8	\$825.00	\$660.00	Agreed.	0.8	\$660.00		0.8	\$660.00
5/20/2025	KT	Begin preparing reply in support of J. Knecht's motion to dismiss	5.7	\$285.00	\$1,624.50	Objection - excessive and vague as to specific tasks that justify 5.70 hours of billing. Reduce to 1.50.	1.5	\$427.50	Detailed review of response required extensive time to uncover, confirm and brief fabricated case law	5.7	\$1,624.50
5/20/2025	MD	prepare hearing materials on motion for protective order;	0.5	\$275.00	\$137.50	Agreed.	0.5	\$137.50		0.5	\$137.50
5/20/2025	JB	finalize edits to ECI reply in support of motion to dismiss; preparation for hearing on motion for protective order, including review of discovery, response, cases cited, outline argument for same	1.9	\$825.00	\$1,567.50	Agreed.	1.9	\$1,567.50		1.9	\$1,567.50
5/21/2025	MD	Prepare and submit order denying motion for protective order; review correspondence from counsel regarding same	0.7	\$275.00	\$192.50	Agreed	0.7	\$192.50		0.7	\$192.50
5/21/2025	JB	Preparation for and attendance at hearing on motion for protective order; draft and revise proposed order on same; correspondence with opposing counsel regarding same; report to client group regarding same; work on reply in support of J. Knecht motion to dismiss; correspondence with client group regarding same	3.5	\$825.00	\$2,887.50	Agreed	3.5	\$2,887.50		3.5	\$2,887.50
5/22/2025	KT	Revise and edit reply in support of J. Knecht's motion to dismiss to finalize for filing	1.8	\$285.00	\$513.00	Objection - duplicative billing with JB on 5.21.25. Reduce to .80.	0.8	\$228.00	Extensive review of fabricated case law required additional time to confirm serious allegations	0.8	\$228.00
5/22/2025	JB	Review and revise reply in support of J. Knecht motion to dismiss; correspondence with client group and further revise same for filing	0.9	\$825.00	\$742.50	Objection - duplicative billing with KT on 5.22.25. Reduce to .40.	0.4	\$330.00	Extensive review of fabricated case law required additional time to confirm serious allegations	0.4	\$330.00
5/22/2025	MD	Revise and file reply in support of J. Knecht's motion to dismiss in ByoPlanet district case	0.4	\$275.00	\$110.00	Agreed.	0.4	\$110.00		0.4	\$110.00
5/29/2025	JB	Review Order to Show Cause in case against J. Knecht; correspondence with client regarding same	0.2	\$825.00	\$165.00	Objection - Review is not responding to AI generative pleadings. Reduce to .00.	0	\$0.00	Directly related to Order to Show Cause which arose out of use of AI	0.2	\$165.00
6/2/2025	TMW	Strategize with P. Klock regarding order to show cause hearing	0.2	\$305.00	\$61.00	Objection - Reduce to .00. Not a response to AI generative pleading.	0	\$0.00	Agree	0	\$0.00
6/2/2025	KT	Continue preparing motion to stay discovery pending resolution of motions to dismiss; continue preparing Promark's answer brief in response to appeal	3.3	\$285.00	\$940.50	Objection - Reply brief would have been responded to whether pleading contained AI generative cases. Reduce to 1.60.	1.6	\$456.00	Agree	1.6	\$456.00
6/2/2025	JB	Correspondence and telephone conference with client regarding Order to Show Cause in J. Knecht case	0.3	\$825.00	\$247.50	Objection - Reduce to .00. Not in response to AI generative pleading.	0	\$0.00	Directly related to Order to Show Cause which arose out of use of AI	0.3	\$247.50
6/3/2025	KT	Continue preparing Promark's answer brief in response to appeal	2	\$285.00	\$570.00	Objection - Reduce to .00. Response to brief would occur whether pleading contained AI generative case law or not.	0	\$0.00	Agree	0	\$0.00
6/4/2025	KT	Continue preparing Promark's answer brief in response to appeal	3.5	\$285.00	\$997.50	Objection - Reduce to .00. Response to brief would occur whether pleading contained AI generative case law or not.	0	\$0.00	Agree	0	\$0.00

6/5/2025	KT	Continue preparing Promark's answer brief in response to appeal	1.5	\$285.00	\$427.50	Objection - Reduce to .00. Response to brief would occur whether pleading contained AI generative case law or not.	0	\$0.00	Agree	0	\$0.00
6/5/2025	JB	Begin review pleadings in preparation for hearing on Order to Show Cause	0.7	\$825.00	\$577.50	Agreed	0.7	\$577.50		0.7	\$577.50
6/6/2025	KT	Continue preparing Promark's answer brief in response to appeal	1.3	\$285.00	\$370.50	Objection - Reduce to .00. Response to brief would occur whether pleading contained AI generative case law or not.	0	\$0.00	Agree	0	\$0.00
6/7/2025	KT	Continue preparing Promark's answer brief in response to appeal; review and analyze caselaw regarding procedure for raising allegations of intrinsic fraud	4	\$285.00	\$1,140.00	Objection - Reduce to .00. Response to brief would occur whether pleading contained AI generative case law or not.	0	\$0.00	Agree	0	\$0.00
6/9/2025	MD	Pull documents in Gilstrap matter; prepare and file notice of filing of same	0.6	\$275.00	\$165.00	Objection - not related to AI generative case response. Reduce to .00.	0	\$0.00	Directly related to Order to Show Cause and ensure clear record in Knecht case	0.6	\$165.00
6/9/2025	KT	Continue preparing Promark's answer brief in response to appeal; strategize with team regarding same; revise and edit answer brief to prepare for filing	5.9	\$285.00	\$1,681.50	Objection - Reduce to .00. Response to brief would occur whether pleading contained AI generative case law or not	0	\$0.00	Agree	0	\$0.00
6/9/2025	JB	Review and revise Appellee Brief in appeal, including review of Appellant Brief; review pleadings in preparation for order to show cause, including review of related cases, prepare timeline of transgressions for same; review Gilstrap reply regarding order to show cause	4.8	\$825.00	\$3,960.00	Objection - Reduce to 1.50. Response to brief would occur whether pleading contained AI generative case law or not	1.5	\$1,237.50	Other than appellate brief, all time related to preparation for Order to Show Cause hearing which directly arose out of AI usage. Agree to 2 hr reduction.	2.8	\$2,310.00
6/10/2025	KT	Strategize with team regarding preparation of replies in support of motions to dismiss, finalization of Promark's answer brief in response to the appeal, and hearing on sanctions; review and analyze caselaw cited by Debt Dynamics in responses to motions to dismiss	1.7	\$285.00	\$484.50	Objection - Reduce based on response to answer brief in response to the appeal. Reduce to 1.00.	1	\$285.00	Agree	1	\$285.00
6/10/2025	JB	Continued preparation for hearing on Order to Show Cause; review reply filed by J. Paul; analysis of cases cited by same; outline argument, case arguments for same; review notice of transfer of Gilstrap case; correspondence with client regarding same; continued preparation for hearing; review order continuing hearing; correspondence with client re same	4.4	\$825.00	\$3,630.00	Objection - Only entry that relates to response to generative AI cases is review reply filed by J.Paul. Reduction to .80.	0.8	\$660.00	All time related to preparation for Order to Show Cause hearing which directly arose out of AI usage.	4.4	\$3,630.00
6/10/2025	MD	ByoPlanet v Knecht - review notice of filing by Byoplanet and revise hearing materials in connection with show cause hearing	0.2	\$275.00	\$55.00	Agreed	0.2	\$55.00		0.2	\$55.00
6/12/2025	KT	Continue reviewing and analyzing caselaw cited by Debt Dynamics in responses to motions to dismiss	1.3	\$285.00	\$370.50	Agreed	1.3	\$370.50		1.3	\$370.50
6/13/2025	TMW	Draft outline for hearing on order to show cause	1.8	\$305.00	\$549.00	Agreed	1.8	\$549.00		1.8	\$549.00
6/16/2025	JB	Review records of multiple cases in preparation for hearing on Order to Show Cause	0.6	\$825.00	\$495.00	Agreed	0.6	\$495.00		0.6	\$495.00
6/17/2025	KT	Strategize with team regarding filing of ECI's reply in support of its motion to dismiss; revise and edit same to finalize for filing; strategize with team regarding hearing on order to show cause	1.6	\$285.00	\$456.00	Objection - reply in support of motion to dismiss would occur whether AI generative cases arose or not. Reduce to .80.	0.8	\$228.00	Agree	0.8	\$228.00

6/17/2025	AM	Assist in preparation for hearing on order to show cause	0.5	\$155.00	\$77.50	Objection - vague. Reduce to .00.	0	\$0.00	Agree	0	\$0.00
6/17/2025	MD	Revise and file ECI's reply in support of motion to dismiss Debt Dynamics complaint	0.2	\$275.00	\$55.00	Objection - reduce to .00. reply in support of motion to dismiss would occur with or without AI generative cases.	0	\$0.00	Agree	0	\$0.00
6/17/2025	JB	Continued preparation for hearing on Order to Show Cause in J. Knecht case, including review of pleadings, timeline case law; compile pleading package for court; attendance at hearing, including meeting with counsel for C. Gilstrap; report to clients regarding same; outline preparation of supplemental brief for same	4.9	\$825.00	\$4,042.50	Agreed.	4.9	\$4,042.50		4.9	\$4,042.50
6/17/2025	TMW	Attend hearing on Order to Show Cause and take notes of the same; draft correspondence to client regarding hearing	1.8	\$305.00	\$549.00	Objection - double billing for something that was handled solely by JB during hearing. Reduce to .00.	0	\$0.00	Agree	0	\$0.00
6/18/2025	KT	Strategize with team regarding preparation of replies in support of Defendants' motions to dismiss Debt Dynamics' complaint	0.3	\$285.00	\$85.50	Objection - reply in support of Defendants' motion to dismiss would have occurred whether AI generative cases were included. Reduce to .00.	0	\$0.00	Agree	0	\$0.00
6/20/2025	TMW	Review pleadings in all state and federal court pleadings for J. Paul's use of AI; prepare supplemental brief; prepare affidavit of attorneys' fees	6.2	\$305.00	\$1,891.00	Objection. I disagree that this task took 6.20 hours. Would be ok with reducing to half that amount. 3.10.	3.1	\$945.50	Use of AI was extensive, over 16 filings in 8 cases. This task required extensive time to compile.	6.2	\$1,891.00
6/20/2025	KT	Strategize with team regarding supplemental brief and analysis of fabricated caselaw	0.1	\$285.00	\$28.50	Agreed.	0.1	\$28.50		0.1	\$28.50
6/23/2025	TMW	Review and revise supplemental brief; review and revise affidavit of attorneys' fees	2.8	\$305.00	\$854.00	Objection - vague - which supplemental brief?	2.8	\$854.00	Agreed by Plaintiff per email 7/23	2.8	\$854.00
6/23/2025	KT	Begin preparing reply in support of Promark's motion to dismiss Debt Dynamics' complaint	5.4	\$285.00	\$1,539.00	Objection - excessive billing. Reduce to 2.70.	2.7	\$769.50	Agree	2.7	\$769.50
6/24/2025	KT	Continue preparing reply in support of Promark's motion to dismiss Debt Dynamics' complaint; begin preparing reply in support of Knecht Defendants' motion to dismiss Debt Dynamics' complaint	5.6	\$285.00	\$1,596.00	Objection - excessive billing. Reduce to 2.80.	2.8	\$798.00	Agree	2.8	\$798.00
6/24/2025	TMW	Review and revise supplemental briefing	3	\$305.00	\$915.00	Objection - supplemental briefing of what matter? Reduce to .00.	3	\$915.00	Agreed by Plaintiff per email 7/23	3	\$915.00
6/24/2025	JB	Review fee detail and prepare schedule of fees related to AI responses per court directive	1.8	\$825.00	\$1,485.00	Agreed	1.8	\$1,485.00		1.8	\$1,485.00
6/25/2025	KT	Continue preparing reply in support of the Knecht Defendants' motion to dismiss Debt Dynamics' complaint	2.4	\$285.00	\$684.00	Agreed	2.4	\$684.00		2.4	\$684.00
6/25/2025	JB	Continued review of fee detail in preparation for supplemental brief; review and revise responses on behalf of Promark and Knecht defendants in Debt Dynamics case; work on supplemental brief	4.4	\$825.00	\$3,630.00	Objection - supplemental brief of which matter - reduce to that portion - Reduce total 2.90.	4.4	\$3,630.00	Agreed by Plaintiff per email 7/23	4.4	\$3,630.00
6/25/2025	TMW	Draft legal standard section of supplemental brief	1.4	\$305.00	\$427.00	Objection - supplemental brief of which matter - reduce to .00	1.4	\$427.00	Agreed by Plaintiff per email 7/23	1.4	\$427.00
TOTAL			121.7		\$54,661.50		57.3	\$29,900.50		70.6	\$36,663.00

% Reductor 45.30%

% Reductio 32.93%

EXHIBIT B



Re: Liebowitz' Order

From James M. Paul, Esq. <Jpaul@justicelawgroup.ai>

Date Wed 7/23/2025 5:21 PM

To O'Malley, Drew <domalley@spencerfane.com>

Drew,

The amount of the reduction based on my calculation is \$26,834.00. Not sure what the total amount is you are seeking in fees as your invoices were a bit confusing. Speaking transparently, I do not know when I will be able to make payment. I am a solo practitioner with one client who has yet to pay me. Just speaking the truth.

James M. Paul, Esq.

Justice Law Group, LLP

850 Southeast 8th Avenue

Fort Lauderdale, FL 33316

Email: Jpaul@justicelawgroup.ai

Phone: 917-562-9607

From: O'Malley, Drew <domalley@spencerfane.com>

Sent: Wednesday, July 23, 2025 10:01 AM

To: James M. Paul, Esq. <Jpaul@justicelawgroup.ai>

Subject: RE: Liebowitz' Order

Thanks, James. Will you confirm the total amount you are proposing and the date on which you would agree to make the payment?

Drew O'Malley Attorney

Spencer Fane LLP

201 North Franklin Street, Suite 2150 | Tampa, FL 33602

☎ 813.424.3509

domalley@spencerfane.com | spencerfane.com

From: James M. Paul, Esq. <Jpaul@justicelawgroup.ai>

Sent: Tuesday, July 22, 2025 9:00 PM

To: O'Malley, Drew <domalley@spencerfane.com>

Subject: [EXTERNAL] Re: Liebowitz' Order

[Warning] This E-mail came from an External sender. Please do not open links or attachments unless you are sure it is trusted.

Drew,

Attached please find my comments in red. Apologies, as when I went to export your document into Word from PDF, the formatting became a little misplaced.

James M. Paul, Esq.

Justice Law Group, LLP

850 Southeast 8th Avenue

Fort Lauderdale, FL33316

Email: jpaul@justicelawgroup.ai

Phone: [917-562-9607](tel:917-562-9607)

From: O'Malley, Drew <domalley@spencerfane.com>

Sent: Tuesday, July 22, 2025 3:01 PM

To: James M. Paul, Esq. <jpaul@justicelawgroup.ai>

Subject: RE: Liebowitz' Order

Hi James,

The invoices are redacted to exclude: (1) info protected by attorney-client privilege and the attorney work product doctrine; (2) entries that do not pertain to the fees the court asked for; and (3) \$0 cost entries. And we do not see the relevance of the agreement with our client based upon the Court's order. Happy to discuss.

Thanks,

Drew

Drew O'Malley Attorney

Spencer Fane LLP

201 North Franklin Street, Suite 2150 | Tampa, FL 33602

☎ 813.424.3509

domalley@spencerfane.com | spencerfane.com

From: James M. Paul, Esq. <jpaul@justicelawgroup.ai>

Sent: Tuesday, July 22, 2025 12:50 PM

To: O'Malley, Drew <domalley@spencerfane.com>

Subject: [EXTERNAL] Re: Liebowitz' Order

[Warning] This E-mail came from an External sender. Please do not open links or attachments unless you are sure it is trusted.

Drew,

Can you please explain to me why the invoices are redacted? Additionally, can you provide me with your retainer agreement with Charles?

James M. Paul, Esq.

Justice Law Group, LLP

850 Southeast 8th Avenue

Fort Lauderdale, FL33316

Email: jpaul@justicelawgroup.ai

Phone: [917-562-9607](tel:917-562-9607)



SpencerFane®

[REDACTED]

Chuck Gilstrap

[REDACTED]

INVOICE NO.: 1400816
INVOICE DATE: 05/15/2025
CLIENT / MATTER NO.: 5523726.0001
BILL ID: 7134

BILLING SUMMARY

CURRENT INVOICE

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Payment Options
ACH/Wire

[REDACTED]

Client/Matter
Check
Credit Card

5523726-0001
Spencer Fane LLP | PO Box 872037 | Kansas City, MO 64187-2037
www.SpencerFane.com/online-bill-payment/

05/15/2025
CLIENT NO: 5523726
Chuck Gilstrap



Page 2
INVOICE NO:1400816

SUMMARY OF INVOICE

FOR PERIOD ENDING 04/30/2025
(SEE DETAIL ATTACHED)

<u>Matter Number</u>	<u>Matter Description</u>	<u>Fees</u>	<u>Discount</u>	<u>Costs</u>	<u>Tax</u>	<u>Total</u>
5523726-0001	ByoPlanet					
	Invoice Total					
	Current Trust Balance					

04/30/2025

[illegible]

05/15/2025
CLIENT NO: 5523726
Chuck Gilstrap



Page 4
INVOICE NO:1400816

Date	Tkpr	Description	Hours	Amount
04/08/2025	EAC	Draft initial Defendant's Motion for Extension of Time to Respond to Complaint	0.60	198.00
JP Comment: Reduce to .00 Not responsive to AI generative pleading.				
04/08/2025	DPO	Prepare for and engage in communications with opposing counsel regarding both cases against client and extension of time to respond to same.	0.70	441.00
JP Comment: Same as above Reduce to .00. Not responsive to AI generative pleading.				

05/15/2025
CLIENT NO: 5523726
Chuck Gilstrap



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INVOICE NO:1400816

Date	Tkpr	Description	Hours	Amount
04/09/2025	DPO	Review and revise motion for extension of time to respond to complaint; review stipulation as to service of process.		
		JP Comment: Response would have occurred whether pleading contained AI generative pleading or not. Reduce to .00.		
04/10/2025	EAC	Review court docket on new federal case to assess case status and identify recent filings; calculate applicable response and compliance deadlines based on procedural rules and Order Requiring Counsel to meet, file joint scheduling report and joint discovery report; note key upcoming dates and update internal case tracking accordingly.	0.80	504.00
		JP Comment: Response would have occurred whether pleading contained AI generative pleading or not. Reduce to .00.	0.60	198.00
04/11/2025	EAC	Draft and finalization of Unopposed Motion for Extension of Time to Respond to Complaint in 25-cv-60630 case.	0.30	99.00
		JP Comment: Response would have occurred whether pleading contained AI generative pleading or not. Reduce to .00.		

05/15/2025
CLIENT NO: 5523726
Chuck Gilstrap



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INVOICE NO:1400816

Date	Tkpr	Description	Hours	Amount
04/14/2025	DPO	Review and revise second motion for extension of time to respond to complaint.	0.30	189.00
		JP Comment: Response would have occurred whether pleading contained AI generative pleading or not. Reduce to .00.	1.00	610.00
04/15/2025	RLG	Email correspondence with J. Hedrick regarding setting call with client regarding [REDACTED] integrate J. Hedrick edits into Response to Motion to Remand; e-mail correspondence with client, E. Coutu, and J. Hedrick regarding [REDACTED] start drafting Motion to Dismiss ([REDACTED]).		
			3.80	2,318.00
		JP Comment: Motion to Dismiss would have occurred whether pleading contained AI generative pleading or not. Reduce to .00.		
04/16/2025	RLG	Email correspondence with J. Hedrick regarding strategy for Motion to Dismiss; review and approve E. Coutu draft of motion for admission pro hac vice in RICO matter; continue drafting Motion to Dismiss ([REDACTED]); legal research for same ([REDACTED]).		
		JP Comment: Response would have occurred whether pleading contained AI generative pleading or not. Reduce to .00.		
04/16/2025	JLH	Correspond with D. O'Malley regarding [REDACTED]; consider next steps; correspond with counsel to P. Johansson; status update email to C. Gilstrap.	0.40	300.00
		JP Comment: Reduce to .00. Not responsive to generative AI case pleading.		
04/17/2025	RLG		3.70	2,257.00

team regarding strategy for addressing misrepresentations by opposing counsel. JP Comment – Would have to respond to Motion to Dismiss regardless of generative AI cases. Reduce to .00

05/15/2025
CLIENT NO: 5523726
Chuck Gilstrap



Page 5
INVOICE NO:1400816

Date	Tkpr		Hours	Amount
04/17/2025	JLH	Coordinate with R. Gibson regarding Motion to Dismiss and [REDACTED] [REDACTED]; phone conference with G. Harper, counsel to P. Johansson, regarding [REDACTED].	0.50	375.00

JP Comment:: Agreed.

05/15/2025
 CLIENT NO: 5523726
 Chuck Gilstrap



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 INVOICE NO:1400816

Date	Tkpr	Description	Hours	Amount
04/19/2025	RLG	Continue drafting Motion to Dismiss ([REDACTED] [REDACTED]).	1.40	854.00
				JP Comment: Would have to respond to MTD regardless of AI generative cases.. Reduce to .00.
04/20/2025	RLG			
			2.80	1,708.00
		notes for Motion to Dismiss in RICO matter: further email correspondence with J. Hedrick and client regarding [REDACTED].		
		JP Comment: Same as comment for 4.19.25		
04/21/2025	RLG	Finish drafting Motion to Dismiss removed case ([REDACTED] [REDACTED]; draft proposed order for same; email correspondence with J. Hedrick and team regarding same; phone conference with client and J. Hedrick regarding Motion to Dismiss and general case strategy.	2.20	1,342.00
		JP Comment: Same as comment for 4.20.25		
04/22/2025	RLG	Further notes for Motion to Dismiss in RICO case; email correspondence with J. Hedrick and client [REDACTED] in connection with same. JP Comment: Reduce to .00. Would have to file MTD regardless.	0.40	244.00

05/15/2025 same. Page 6

CLIENT NO: 5523726 Email correspondence with client and J. Hedrick regarding [REDACTED] 0.30 INVOICE NO: 1400816

04/23/2025 RLG [REDACTED] JP Comment: Agreed. 183.00

Date	Tkpr	Description	Hours	Amount
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05/15/2025
CLIENT NO: 5523726
Chuck Gilstrap



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INVOICE NO:1400816

Date	Tkpr	Description	Hours	Amount
04/25/2025	EAC	Review, revise, and finalize Defendant's Motion to Dismiss; review and revise proposed Order [REDACTED]; draft and send correspondence to Judge enclosing proposed Order. JP Comment: Agreed.	0.60	198.00
04/25/2025	DPO	Review and revise motion to dismiss complaint. JP Comment: Duplicative Entry multiple attorneys' same task. Reduce to .00	1.30	819.00
			2.20	1,342.00
04/27/2025	RLG	Draft [REDACTED] for RICO case; email correspondence with J. Hedrick and E. Rodriguez regarding same; start drafting Motion to Dismiss RICO case ([REDACTED]). JP Comment: Duplicative Entry multiple attorneys' same task. Reduce to .00		
			1.30	793.00
04/28/2025	RLG	Email correspondence with E. Coutu regarding [REDACTED] in RICO matter; review and approve E. Coutu draft of certificates of interested parties for both cases; email correspondence with J. Hedrick and E. Rodriguez regarding [REDACTED]; email correspondence with E. Rodriguez, J. Hedrick, and counsel for P. Johansson (G. Harper) regarding [REDACTED]; continue drafting Motion to Dismiss RICO case ([REDACTED]). JP Comment: Duplicative entries from 4.27.25. Reduce to .00.		
04/29/2025	RLG	Email correspondence with E. Coutu regarding [REDACTED] from court; continue drafting Motion to Dismiss RICO case ([REDACTED]); draft proposed order granting same; legal research in connection with Motion to Dismiss RICO case ([REDACTED]). JP Comment: Duplicative entries from 4.27.25. Reduce to .00.	1.80	1,098.00

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/30/2025	RLG	Phone conference with J. Hedrick regarding case status and strategy and	0.90	549.00

JP Comment: Reduce to 00. Not responsive to generative AI pleadings.

Total Service

FOR DISBURSEMENTS ADVANCED

Date	Description	Amount
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Total Disbursements:

05/15/2025
CLIENT NO: 5523726
Chuck Gilstrap



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INVOICE NO:1400816

TOTAL FOR FILE 5523726-0001

\$ [REDACTED]

This Invoice's Totals in Connection with Responding to
Filings Using Generative AI:

Drew P. O'Malley: 3.1 hours at \$630 = \$1,953 (2.1 hours
and \$1,323 just for this case)
Joshua L. Hedrick: 1.2 hours at \$750 = \$900 (1.2 hours
and \$900 just for this case)
Rebecca L. Gibson: 23.5 hours at \$610 = \$14,335 (16.1
hours and \$9,821 just for this case)
Elizabeth Coutu: 2.1 hours at \$330 = \$693 (1.2 hours
and \$396 just for this case)

Totals: \$17,881

Total Specific to Case # 0:25-cv-60647-DSL: \$12,440

05/15/2025
CLIENT NO: 5523726
Chuck Gilstrap



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INVOICE NO:1400816

TIME AND FEE SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>	<u>Standard Rate</u>
Joshua L. Hedrick	750.00			
Drew P. O'Malley	630.00			
Rebecca L. Gibson	610.00			
Elizabeth A. Coutu	330.00			
Eli Rodriguez	230.00			
Totals				



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Phone 816.474.8100
Federal ID # 44-0561981

Chuck Gilstrap
[REDACTED]

INVOICE NO.: 1411793
INVOICE DATE: 06/13/2025
CLIENT / MATTER NO.: 5523726.0001
BILL ID: 7134

BILLING SUMMARY

CURRENT INVOICE

Total Legal Fees
Less Courtesy Discount
Total Disbursements
Current Total

[REDACTED]

Payment Options
ACH/Wire

[REDACTED]

Client/Matter
Check
Credit Card

5523726-0001
Spencer Fane LLP | PO Box 872037 | Kansas City, MO 64187-2037
www.SpencerFane.com/online-bill-payment/

06/13/2025
CLIENT NO: 5523726
Chuck Gilstrap



Page 2
INVOICE NO:1411793

SUMMARY OF INVOICE

FOR PERIOD ENDING 05/31/2025
(SEE DETAIL ATTACHED)

<u>Matter Number</u>	<u>Matter Description</u>	<u>Fees</u>	<u>Discount</u>	<u>Costs</u>	<u>Tax</u>	<u>Total</u>
5523726-0001	ByoPlanet					
	Invoice Total					
	Current Trust Balance					

06/13/2025
 CLIENT NO: 5523726
 Chuck Gilstrap



Page 3
 INVOICE NO:1411793

Re: File 5523726-0001

ByoPlanet

Invoice for period ended

05/31/2025

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/2025	RLG	Continue drafting Motion to Dismiss RICO case ([REDACTED]). JP Comment: Duplicative entries from RLG last three previous entries. Reduce to .00.	1.50	915.00
05/05/2025	RLG	Review Plaintiffs' Response to Motion to Dismiss in removed case, with notes for Reply in Support; start drafting Reply in Support of Motion to Dismiss ([REDACTED]); legal research in connection with drafting same ([REDACTED]). JP Comment: Agreed.	2.50	1,525.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
05/06/2025	RLG	[REDACTED]	1.50	915.00
JP Comment: Agreed				
05/07/2025	RLG	Continue drafting Reply in Support of Motion to Dismiss ([REDACTED]). JP Comment: Reduce to .50 Same as above 5.6.25 entry.	1.00	610.00
05/08/2025	RLG	Continue drafting Reply in Support of Motion to Dismiss ([REDACTED]); email correspondence with J. Hedrick regarding same.	1.60	976.00
JP Comment: Reduce to .80. Same entry as above for 5.7.25			0.60	366.00
			0.20	150.00
05/09/2025	RLG	Integrate J. Hedrick edits into Reply in Support of Motion to Dismiss in removed case; email correspondence with J. Hedrick and client regarding same. JP Comment: Agreed.		
05/09/2025	JLH	Review draft reply brief and correspond with R. Gibson regarding comments on same. JP Comment: Agreed.	2.50	1,525.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
05/11/2025	RLG	Finish reviewing co-Defendant's newly-filed Motion to Dismiss in RICO case, with notes; continue drafting Motion to Dismiss RICO case ([REDACTED]); email		

06/13/2025
CLIENT NO: 5523726
Chuck Gilstrap

correspondence with E. Coult regarding finalizing Reply in Support of
Motion to Dismiss in removed case for filing tomorrow.



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Page 3

INVOICE NO:1411793

JP Comment: Excessive billing; Reduce amount to 1.30.

06/13/2025
CLIENT NO: 5523726
Chuck Gilstrap



Page 4
INVOICE NO:1411793

<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/12/2025	RLG	Review newly-entered court order referring co-Defendant's Motion to Dismiss in RICO matter to magistrate; continue drafting Motion to Dismiss RICO case ([REDACTED]); legal research for same [REDACTED]; email correspondence with J. Hedrick and team regarding same and case strategy. JP Comment: Not related to responsive generative AI pleading. Reduce to .00.	2.40	1,464.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
05/12/2025	DPO	Perform final review of reply in support of motion to dismiss as local counsel. JP Comment: Reduction to .80.		
05/13/2025	RLG	Finish drafting Motion to Dismiss RICO case ([REDACTED]); email correspondence with J. Hedrick regarding same; start drafting Response to co-Defendant's Motion to Dismiss in RICO case. JP Comment: Duplicate billing on same matter with multiple partners. Reduce to .00	1.30	819.00
			1.40	854.00
05/13/2025	JLH	Phone conference with C. Gilstrap regarding matter status and next steps; consider same. JP Comment: Reduce to .00. No relation to response to generative AI pleading.	0.60	450.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
05/15/2025	RLG	Finish drafting response to co-Defendant's Motion to Dismiss in RICO case [REDACTED]; email correspondence with J. Hedrick regarding same; legal research for same [REDACTED]; email correspondence with J. Hedrick regarding Motion to Dismiss in RICO case and case strategy.	1.60	976.00
		JP Comment: Reduce to .70, as duplicative entry for RLG on previous entries.	0.80	600.00
05/15/2025	JLH	Review draft response to co-defendant's motion to dismiss; correspond with R. Gibson regarding same; review draft motion to dismiss RICO case; correspond with R. Gibson regarding same; correspond with D. O'Malley regarding [REDACTED]. JP Comment: Reduce to .00, not responsive to AI generative pleadings.	2.50	1,525.00
05/16/2025	RLG	Integrate J. Hedrick edits into drafts of Motion to Dismiss in RICO case and Response to co-Defendant's Motion to Dismiss in RICO case; email correspondence with client and J. Hedrick regarding Motion to Dismiss in RICO case; email correspondence with team regarding case strategy in light of [REDACTED]; research same and review key documents from same; review ByoPlanet's newly-filed response to co-Defendant's Motion to Dismiss in RICO case, with notes.		

IP Comments: Reduce amount to 120, based on previous duplicative entries.

06/13/2025

██████████: 5523 ██████████

Chuck Gilstrap



Spencer Lane

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INVOICE NO ██████████ 1793

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 CLIENT NO: 5523726
 Chuck Gilstrap



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Date	Tkpr	Description	Hours	Amount
05/20/2025	RLG	Email correspondence with client, J. Hedrick, E. Coutu, and D. O'Malley regarding Motion to Dismiss in RICO matter and Response to Johansson's Motion to Dismiss in RICO matter: finalize same for filing; start drafting Motion to Consolidate (); draft proposed order for same.	1.60	976.00
		JP Comment: Same as above reduce to .80.	0.50	165.00
05/20/2025	EAC	Review, revise and finalization of Defendant Gilstrap's Motion to Dismiss; draft correspondence to Judge Dimitrouleas attaching proposed Order in connection with Motion to Dismiss.		
		JP Comment: Agreed.		
05/20/2025	DPO	Review motion to dismiss complaint and response to motion for arbitration.	1.80	1,134.00
		JP Comment: Reduce based on response to motion for arbitration as it is not responsive to AI generative pleadings.		
		Reduce to .90		
05/22/2025	RLG	Start reviewing Plaintiff's newly-filed Response to Motion to Dismiss in RICO matter, with notes for Reply in Support; discuss same with J. Hedrick; start legal research for Reply in Support of Motion to Dismiss in RICO matter ().	1.30	793.00
		JP Comment: Agreed.		
			1.60	976.00
05/23/2025	RLG	Finish reviewing Plaintiff's newly-filed Response to Motion to Dismiss in RICO matter, with notes for Reply in Support; further legal research for Reply in Support of Motion to Dismiss in RICO matter (); start drafting same ().		
		JP Comment: Duplicative entry between RLG on 5.22.25 and 5.23.25 – Reduce to .80.		
05/24/2025	RLG	Continue drafting Reply in Support of Motion to Dismiss in RICO matter	1.10	671.00
		JP Comment: Duplicative entry between RLG on 5.22.25, 5.23.25 and 5.24.25. Reduce to .60		
05/25/2025	RLG	Finish drafting Reply in Support of Motion to Dismiss in RICO matter ()		

06/13/2025

CLIENT NO: 5523726
05/26/2025 RLG
Chuck Gilstrap

with J. Hedrick regarding same.

Email correspondence with J. Hedrick and client regarding Reply in Support of Motion to Dismiss in RICO matter; edit same consistent with J. Hedrick feedback; continue drafting Motion to Consolidate ([REDACTED])

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JP Comment: Duplicative entry between RLG on 5.22.25, 5.23.25 and 5.25.25, 5.26.25 and Reduce to .80

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CLIENT NO: 5523726
Chuck Gilstrap



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<u>Date</u>	<u>Tkpr</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/26/2025	JLH	Review draft reply brief and correspond with R. Gibson regarding same.	0.30	225.00
		[REDACTED]		
		JP Comment: Agreed.		
05/28/2025	RLG	Further email correspondence with J. Hedrick, team, and client regarding Reply in Support of Motion to Dismiss in RICO matter and finalizing same	3.20	1,952.00
		[REDACTED]	0.2	\$122
			(related to responding to filings using generative AI)	
		JP Comment: Agreed.		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
05/29/2025	RLG	Check docket in related Knecht case and review latest filings, with notes; email correspondence with J. Hedrick and team regarding same and strategy in light of same; email correspondence with client regarding [REDACTED]; phone conferences and email correspondence with D. O'Malley, K. Corcoran, counsel for Knecht (J. Bast), and opposing counsel (J. Paul) conferring about motion to consolidate and request to stay discovery and responding to opposing counsel's proposal of cooperation agreement; review and edit E. Coutu drafts of notices of show cause order to file in RICO and removed case; email correspondence with team regarding same; continue drafting Motion to Consolidate ([REDACTED]); email correspondence with counsel for Johansson to confer regarding same.	3.30	2,013.00
			1.0	\$610
			(related to responding to filings using generative AI)	
		JP Comment: Agreed.		
05/29/2025	DPO	Review and finalize reply in support of motion to dismiss; prepare for and engage in call with opposing counsel; engage in call with Jarred Knecht's counsel regarding [REDACTED]	2.40	1,512.00
		JP Comment: Agreed		
05/29/2025	JLH	Review order from Knecht case; correspond with R. Gibson regarding same; consider next steps; correspond with D. O'Malley regarding same.	0.40	300.00
		JP Comment: Agreed		

FOR DISBURSEMENTS ADVANCED

<u>Date</u>	<u>Description</u>	<u>Amount</u>
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 CLIENT NO: 5523726
 Chuck Gilstrap



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 INVOICE NO:1411793

TIME AND FEES SUMMARY

<u>Timekeeper</u>	<u>Rate</u>	<u>Hours</u>	<u>Fees</u>	<u>Standard Rate</u>
Joshua L. Hedrick	750.00			
Drew P. O'Malley	630.00			
Rebecca L. Gibson	610.00			
Elizabeth A. Coutu	330.00			
Totals				

This Invoice's Totals in Connection with Responding to Filings Using Generative AI:

Drew P. O'Malley: 5.5 hours at \$630 = \$3,465 (1.3 hours and \$819 just for this case)
 Joshua L. Hedrick: 2.3 hours at \$750 = \$1,725 (0.5 hours and \$375 for this case)
 Rebecca L. Gibson: 28.8 hours at \$610 = \$17,568 (7.2 hours and \$4,392 for this case)
 Elizabeth Coutu: 0.5 hours at \$330 = \$165 (0.5 hours and \$165 for this case)

Totals: \$22,923

Total Specific to Case # 0:25-cv-60647-DSL: \$5,586

Totals of Both Invoices in Connection with Responding to Filings Using Generative AI:

Drew P. O'Malley: 8.6 hours at \$630 = \$5,418 (3.4 hours and \$2,142 just for this case)
 Joshua L. Hedrick: 3.5 hours at \$750 = \$2,625 (1.7 hours and \$1,275 for this case)
 Rebecca L. Gibson: 52.3 hours at \$610 = \$31,903 (23.3 hours and \$14,213 for this case)
 Elizabeth Coutu: 2.6 hours at \$330 = \$858 (1.2 hours and \$396 for this case)

Totals: \$40,804

Total Specific to Case # 0:25-cv-60647-DSL: \$18,026

EXHIBIT C

Damien Charlotin



AI Hallucination Cases

This database tracks legal *decisions*¹ in cases where generative AI produced hallucinated content – typically fake citations, but also other types of arguments. It does not track the (necessarily wider) universe of all fake citations or use of AI in court filings.

While seeking to be exhaustive (**230** cases identified so far), it is a work in progress and will expand as new examples emerge. This database has been featured in news media and online posts.² (Readers may also be interested in [this project](#) regarding AI use in academic papers.)

If you know of a case that should be included, feel free to [contact me](#).

Click to Download CSV

State

- Australia (17)
- Brazil (6)
- Canada (18)
- Germany (1)
- India (1)
- Ireland (2)
- Israel (21)
- Italy (1)
- Netherlands (2)
- New Zealand (2)
- South Africa (3)
- Spain (1)
- Trinidad & Tobago (1)
- UK (10)
- USA (140)
- Zimbabwe (1)

Party

- Expert (3)
- Federal Defender (1)
- Judge (3)
- Lawyer (107)
- Paralegal (2)
- Prosecutor (1)
- Pro Se Litigant (113)

From period: Q2 2023

- ☐ Monetary sanction
- ☐ Disciplinary Referral

Case	Court / Jurisdiction	Date ▼	Party Using AI	AI Tool	Nature of Hallucination
In Re CorMedix	D.C. New Jersey (USA)	23 July 2025	Judge	Implied	Misstated precedents, false quotes
Johnson v. Dunn	N.D. Alabama (USA)	23 July 2025	Lawyer	ChatGPT	Fabricated citations

Case	Court / Jurisdiction	Date ▼	Party Using AI	AI Tool	Nature of Hallucination
<u>McCarthy v. DEA</u>	3rd Circuit CA (USA)	21 July 2025	Lawyer	Unidentified	Fabricated citation(s), misrepresented precedents
<u>In re Boy</u>	Illinois AC (USA)	21 July 2025	Lawyer	Unidentified	Fabricated citation(s), misrepresented authorities
<u>In re Marla C. Martin</u>	N.D. Illinois (Bankruptcy) (USA)	18 July 2025	Lawyer	ChatGPT	Fabricated citation(s)
<i>Source: <u>Volokh</u></i>					
<u>Jordan et al. v. Chicago Housing Authority</u>	Cook County District Court (USA)	17 July 2025	Lawyer	ChatGPT	Fabricated citation
USA v. McGee et al.	Alabama D.C. (USA)	16 July 2025	Lawyer	Ghostwriter Legal	Fabricated cases
<u>Hatfield v. Ornelas</u>	(USA)	16 July 2025	Pro Se Litigant	Unidentified	Fabricated citation(s)
<u>Blaser v. Campbell</u>	Civil Resolution Tribunal (Canada)	15 July 2025	Pro Se Litigant	Implied	Fabricated citation(s)
<u>ByoPlanet International v. Johansson and Gilstrap</u>	United States District Court, Southern District of Florida (USA)	15 July 2025	Lawyer, Paralegal	ChatGPT	Fabricated citation(s)
<u>Woodrow Jackson v. Auto-Owners Insurance Company</u>	M.D. Georgia (USA)	14 July 2025	Lawyer	Unidentified	Fabricated citation(s)
<u>Kessler v. City of Atwater</u>	E.D. California (USA)	11 July 2025	Lawyer	Unidentified	Fabricated citation(s)
<u>Lloyd's Register Canada v. Munchang Choi</u>	Federal Court of Canada (Canada)	10 July 2025	Pro Se Litigant	Unidentified	Fabricated citation(s)
<u>NCR v KKB</u>	Court of King's Bench of Alberta (Canada)	9 July 2025	Pro Se Litigant	Implied	Fabricated citation(s)
<u>Case No. 14748-08-21</u>	Supreme Court (Israel)	9 July 2025	Lawyer	Unidentified	Fabricated citation(s)
<u>Gurpreet Kaur v. Captain Joel Desso</u>	NDNY (USA)	9 July 2025	Lawyer	Claude Sonnet 4	False quote(s)

Case	Court / Jurisdiction	Date ▼	Party Using AI	AI Tool	Nature of Hallucination
Foster Chambers v. Village of Oak Park	7th Circuit CA (USA)	9 July 2025	Pro Se Litigant	Implied	Fabricated citations, false quotes, misrepresented precedents
<u>Smith v. Gamble</u>	Ohio CA (USA)	7 July 2025	Pro Se Litigant	Implied	Fabricated citation(s)
<i>Source: <u>Robert Freund</u></i>					
<u>Coomer v. My Pillow, Inc.</u>	D. Colorado (USA)	7 July 2025	Lawyer	Co-Pilot, Westlaw's AI, Gemini, Grok, Claude, ChatGPT, Perplexity	Fabricated citations, false quotes, misrepresented precedents
<u>AQ v. BW</u>	Civil Resolution Tribunal (Canada)	4 July 2025	Pro Se Litigant	Implied	Fabricated citation
<u>Tyrone Walker v. Juliane Pierre</u>	Massachusetts CA (USA)	3 July 2025	Lawyer	Implied	Fabricated citations
Pulserate Investments v. Andrew Zuze and Others	Supreme Court (Zimbabwe)	3 July 2025	Lawyer	Unidentified	12 fabricated citations
<u>Sharita Hill v. State of Oklahoma</u>	W.D. Oklahoma (USA)	3 July 2025	Lawyer	Implied	Fabricated citations, false quotes
<u>Matter of Sewell Properties Trust</u>	Colorado Court of Appeals (USA)	3 July 2025	Pro Se Litigant	Implied	Fabricated citations, quotes, and misrepresented precedents
<u>Anonymous Family Case matter</u>	Köln District Court (Germany)	2 July 2025	Lawyer	Implied	Fictitious citations and references
<u>Bucher v. Appeals Committee</u>	Administrative Court (Israel)	2 July 2025	Lawyer	Implied	Fabricated citation(s)
<u>Angela and Theodore Chagnon v. Holly Nelson</u>	Chancery Court of Wyoming (USA)	2 July 2025	Pro Se Litigant	Implied	One fabricated citation, one misrepresented precedent
<i>Source: <u>Robert Freund</u></i>					
<u>Murray v. State of Victoria</u>	Federal Court (Australia)	2 July 2025	Lawyer	Google Scholar (allegedly)	Fabricated citations; misrepresented precedents
<u>Rafi Najib v MSS Security Pty. Limited</u>	Fair Work Commission (Australia)	2 July 2025	Pro Se Litigant	Unidentified	Fabricated citation
<i>Source: <u>Jay Iver</u></i>					
<u>ATSum 0010525-47.2025.5.03.0037</u>	Regional Labour Court (Brazil)	2 July 2025	Lawyer	Unidentified	Fabricated citations
Doe v. Noem	D.C. DC (USA)	1 July 2025	Lawyer	ChatGPT	One fabricated authority
<u>Crespo v. Tesla, Inc.</u>	S.D. Florida (USA)	30 June 2025	Pro Se Litigant	Implied	Fabricated citations, quotes, and

Case	Court / Jurisdiction	Date ▼	Party Using AI	AI Tool	Nature of Hallucination
					misrepresented precedents
<u>Shahid v. Esaam</u>	Georgia CA (USA)	30 June 2025	Judge, Lawyer	Unidentified	Several fabricated cases, as well as misrepresented ones, some of which were adopted by the trial court below
<u>Northbound Processing v. South African Diamond Regulator</u>	High Court (South Africa)	30 June 2025	Lawyer	Legal Genius	Fabricated cases and misrepresented precedents
<u>Case No. 525309-08-22</u>	Jerusalem Enforcement and Collection Authority (Israel)	30 June 2025	Lawyer	Implied	Fabricated citations to inexistent norms
<u>Sister City Logistics, Inc. v. John Fitzgerald</u>	United States District Court for the Southern District of Georgia (USA)	27 June 2025	Pro Se Litigant		Fabricated citations and quotes
<u>Page v. Long</u>	Melbourne County Court (Australia)	27 June 2025	Pro Se Litigant	Implied	11 Fabricated citations; 2 misrepresented precedents
<u>Parra v. United States</u>	Court of Federal Claims (USA)	27 June 2025	Pro Se Litigant	Unidentified	Fabricated citations
<u>Jakes v. Youngblood</u>	W.D. Penn. (USA)	26 June 2025	Lawyer	Unidentified	Multiple fabricated quotes, including from the court's previous opinions, and misrepresentations
<i>Source: <u>Volokh</u></i>					
<u>Auto Test Ltd. v. Ministry of Transport</u>	Tel Aviv-Yafo District Court (Israel)	25 June 2025	Lawyer	Implied	Non-existent and incorrect legal judgments
<u>Romero v. Goldman Sachs Bank USA</u>	S.D.N.Y. (USA)	25 June 2025	Pro Se Litigant	Implied	Fabricated citation(s), false quotes, misrepresented precedents
<u>Schoene v. Oregon Department of Human Services</u>	United States District Court for the District of Oregon (USA)	25 June 2025	Pro Se Litigant	Implied	Fabricated citation
<u>Dastou v. Holmes</u>	Massachusetts (USA)	25 June 2025	Lawyer	ChatGPT	Fabricated citations and false quotes
<u>Hussein v. Canada</u>	Ottawa (Canada)	24 June 2025	Lawyer	Visto.Ai	Two fabricated citations and misrepresentation of applicable law
<u>Malone & Anor v Laois County Council & Ors</u>	High Court (Ireland)	23 June 2025	Pro Se Litigant	Implied	One false quote from a fabricated authority

Case	Court / Jurisdiction	Date ▼	Party Using AI	AI Tool	Nature of Hallucination
Iskenderian v. Southeastern	Hawai'i (USA)	23 June 2025	Lawyer		Fabricated citations
<u>Mintvest Capital, LTD v. NYDIG Trust Company, et al.</u>	D.C. Puerto Rico (USA)	23 June 2025	Lawyer	Claude	Fabricated citations, false quotes, and misrepresented precedents
<u>Bottrill v Graham & Anor (No 2).</u>	District Court of New South Wales (Australia)	20 June 2025	Pro Se Litigant	Unidentified	References to non-existent and/or misstated judgments and legal principles.
<u>Pro Health Solutions Ltd v ProHealth Inc</u>	Intellectual Property Office (UK)	20 June 2025	Pro Se Litigant, Lawyer	ChatGPT	Fabricated citation(s); Misrepresented precedents
<u>J.R.V. v. N.L.V.</u>	Supreme Court of British Columbia (Canada)	19 June 2025	Pro Se Litigant	Unidentified	Fabricated citations
<u>Attorney General v. \$32,000 in Canadian Currency</u>	Ontario SCJ (Canada)	16 June 2025	Pro Se Litigant	Implied	Two fabricated citations
<u>In re Marriage of Isom and Kareem</u>	Illinois CA (USA)	16 June 2025	Pro Se Litigant	Implied	Fabricated citation(s)
<u>Couvrette v. Wisnovsky</u>	Oregon (USA)	14 June 2025	Lawyer	Unidentified	Fifteen non-existent cases and misrepresented quotations from seven real cases
Taylor v. Cooper Power & Lighting Corp.	E.D.N.Y. (USA)	13 June 2025	Lawyer	Implied	One fabricated citation
<u>Rochon Eidsvig & Rochon Hafer v. JGB Collateral</u>	Texas CA (USA)	12 June 2025	Lawyer	Implied	Four fabricated cases
<u>Department of Justice v Wise</u>	Queensland Civil and Administrative Tribunal (Australia)	11 June 2025	Pro Se Litigant	Implied	Fabricated citations
Reed v. Community Health Care	W.D. Washington (USA)	10 June 2025	Pro Se Litigant	Implied	Fabricated citations, false quotes
<u>Rodney Chagas v. Fabricio Petinelli Vieira Coutinho</u>	Parana State (Brazil)	9 June 2025	Lawyer	Unidentified	Misrepresentation of a precedent
<u>Chen v. Vana et al.</u>	Haifa Magistrate's Court (Israel)	8 June 2025	Lawyer	Unidentified	Fabricated legal citations

Case	Court / Jurisdiction	Date ▼	Party Using AI	AI Tool	Nature of Hallucination
<u>Avinde v. Haringey & Al-Haroun v. QNB</u>	High Court (UK)	6 June 2025	Lawyer	Unidentified	Fabricated citations (including a citation attributed to the judge herself)
Goins v. Father Flanagan's Boys Home	D. Nebraska (USA)	5 June 2025	Pro Se Litigant	Implied	Fabricated citations and misrepresented authorities
<u>Lipe v. Albuquerque Public Schools</u>	D. New Mexico (USA)	4 June 2025	Lawyer	Implied	Fabricated Citations
<u>Ivins v KMA Consulting Engineers & Ors</u>	Queensland Industrial Relations Commission (Australia)	2 June 2025	Pro Se Litigant	Unidentified	Fabricated citations
<u>Powhatan County School Board v. Skinger et al</u>	E.D. Virginia (USA)	2 June 2025	Pro Se Litigant	ChatGPT	Fabricated citations
<u>Ploni v. Wasserman et al.</u>	Small Claims Court (Israel)	1 June 2025	Pro Se Litigant	ChatGPT; Google Search	Two Fabricated Citations
<u>Andersen v. Olympus as Daybreak</u>	D. Utah (USA)	30 May 2025	Pro Se Litigant	Implied	Fabricated citations and misrepresentation of past cases
<u>Anita Krishnakumar et al. v. Eichler Swim and Tennis Club</u>	CA SC (USA)	29 May 2025	Lawyer	Implied	Fabricated citation and quotes
<u>Delano Crossing v. County of Wright</u>	Minnesota Tax Court (USA)	29 May 2025	Lawyer	Unidentified	Five fabricated citations
<u>Mid Cent. Operating Eng'rs Health v. Hoosiervac</u>	S.D. Ind. (USA)	28 May 2025	Lawyer	Unidentified	3 fake case citations
<u>Ko v. Li</u>	Ontario SCJ (Canada)	28 May 2025	Lawyer	ChatGPT	At least 3 fabricated citations and misstatements of law with misleading hyperlinks
<u>GNX v. Children's Guardian</u>	NSW (Australia)	27 May 2025	Pro Se Litigant	ChatGPT	One misrepresented precedent
<u>Brick v. Gallatin County</u>	D. Montana (USA)	27 May 2025	Pro Se Litigant	Implied	Fabricated citations
<u>Mahala Association (מחלה) v. Clalit Health Services et al.</u>	Israel	26 May 2025	Lawyer	Tachdin.AI	Multiple non-existent Supreme Court and District Court decisions, misattributed

Case	Court / Jurisdiction	Date ▼	Party Using AI	AI Tool	Nature of Hallucination
					quotations, and fictitious citations
<u>R. v. Chand</u>	Ontario (Canada)	26 May 2025	Lawyer	Implied	Fabricated citations, and misrepresented authorities
<u>So-and-so v. v. Anonymous</u>	Israel (Israel)	26 May 2025	Lawyer	Implied	Fabricated citations
<u>Vechtel et al. v. Gershoni</u>	Israel (Israel)	25 May 2025	Pro Se Litigant	Implied	Fictitious quotation to the judge's own previous judgments
<u>Rotonde v. Stewart Title Insurance Company</u>	New York (USA)	23 May 2025	Pro Se Litigant	Implied	Fabricated citations
Luther v. Oklahoma DHS	W.D. Oklahoma (USA)	23 May 2025	Pro Se Litigant	Implied	Fabricated citations
<u>Concord v. Anthropic</u>	N.D. California (USA)	23 May 2025	Expert	Claude.ai	Fabricated attribution and title for (existing) article
<i>Source: <u>Volokh</u></i>					
Zherka v. Davey et al.	Massachusetts (USA)	22 May 2025	Pro Se Litigant	Unidentified	Fabricated citations
<u>Garner v. Kadince</u>	Utah C.A. (USA)	22 May 2025	Lawyer	ChatGPT	Fabricated Legal Authorities
<u>Evans et al v. Robertson et al</u>	E.D. Michigan (USA)	21 May 2025	Pro Se Litigant	Implied	Non-existent or misrepresented cases
<u>Happiness Idehen & Felix Ogieva v. Gloria Stoute-Phillip</u>	N.Y. Civil Court (USA)	21 May 2025	Lawyer	Implied	At least 7 fabricated citations
<u>Versant Funding v. Teras Breakbulk Ocean Navigation Enterprises</u>	S.D. Florida (USA)	20 May 2025	Lawyer	Unidentified	1 fabricated citation
<u>Robert Lafayette v. Alex Abrami et al</u>	Vermont SC (USA)	20 May 2025	Pro Se Litigant	Implied	Fictitious citations
Bauche v. Commissioner of Internal Revenue	US Tax Court (USA)	20 May 2025	Pro Se Litigant	Implied	Nonexistent cases
<u>Ehrlich v. Israel National Academy of Sciences et al.</u>	Israel (Israel)	18 May 2025	Pro Se Litigant	Unidentified	Fake citations
<u>Keaau Development</u>	Hawaii ICA (USA)	15 May 2025	Lawyer	Implied	One non-existent case with misattributed

Case	Court / Jurisdiction	Date ▼	Party Using AI	AI Tool	Nature of Hallucination
<u>Partnership LLC v. Lawrence</u>					pinpoint citations from unrelated real cases
<u>USA v. Burke</u>	M.D. Florida (USA)	15 May 2025	Lawyer	Westlaw's AI tools, GPT4.5 Deep Research (Pro)	Multiple fake citations and misquotations
<u>Beenshoof v. Chin</u>	W.D. Washington (USA)	15 May 2025	Lawyer	Implied	One non-existent case
<u>Fox v. Assum</u>	Israel (Israel)	14 May 2025	Lawyer	Unidentified	Reference to a seemingly fictitious judgment
<u>Bandla v. Solicitors Regulation Authority</u>	UK (UK)	13 May 2025	Pro Se Litigant	Google Search (Allegedly)	At least 25 fabricated or non-existent case citations
Source: <u>Natural & Artificial Intelligence in Law</u>					
<u>Ramirez v. Humala</u>	E.D.N.Y. (USA)	13 May 2025	Paralegal	Unidentified	Four fabricated federal and state case citations
Source: <u>Volokh</u>					
<u>Case No. 72079-11-24</u>	Israel (Israel)	12 May 2025	Lawyer	Unidentified	Multiple fictitious court rulings
<u>Crypto Open Patent Alliance v. Wright (2)</u>	UK (UK)	12 May 2025	Pro Se Litigant	Implied	Use of AI to generate verbose/repetitive documents; AI-generated false/non-existent legal citations
<u>Newbern v. Desoto County School District et al.</u>	N.D. Mississippi (USA)	12 May 2025	Pro Se Litigant	Implied	Fabricated case law
<u>Jamisson Roriz de Santana Andrade v.</u>	Bahia (Brazil)	12 May 2025	Lawyer	Implied use of	Multiple fictitious citations to non-existent

Case	Court / Jurisdiction	Date ▼	Party Using AI	AI Tool	Nature of Hallucination
<u>Tribunal Superior do Trabalho</u>				MobiOffice's AI Assistant	constitutional precedents
<u>In re Thomas Grant Neusom</u>	M.D. Florida (USA)	8 May 2025	Lawyer	Unidentified	Multiple fictitious or misrepresented case citations
Source: <u>Natural & Artificial Intelligence in Law</u>					
<u>Israel v. Ibrahim Mahajneh</u>	Israel (Israel)	7 May 2025	Prosecutor	Unidentified	Citation of a completely fictitious Israeli statute
Matter of Raven Investigations & Security Consulting	GAO (USA)	7 May 2025	Pro Se Litigant	Unidentified	Multiple fabricated citations to prior GAO decisions
<u>Rotonde v. Stewart Title Insurance Co</u>	NY SC (USA)	6 May 2025	Pro Se Litigant	Implied	Several non-existent legal citations
<u>Harris v. Take-Two Interactive Software</u>	D. Colorado (USA)	6 May 2025	Pro Se Litigant	Implied	Fabricated case law and quotations
X v. Board of Trustees of Governors State University	N.D. Illinois (USA)	6 May 2025	Pro Se Litigant	Implied	One fabricated citation
<u>Lacey v. State Farm General Insurance</u>	C.D. Cal (USA)	6 May 2025	Lawyer	CoCounsel, Westlaw Precision, Google Gemini	Nine citations incorrect or fabricated; multiple invented quotations from real or fictitious cases
<u>Flowz Digital v. Caroline Dalal</u>	C.D. Cal (USA)	5 May 2025	Lawyer	Lexis+AI	Fabricated citation, and misrepresented precedents
<u>Lozano González v. Roberge</u>	Housing Administrative Tribunal (Canada)	1 May 2025	Pro Se Litigant	ChatGPT	Fabricated norms (due to AI-based translation)
<u>Nexgen Pathology Services Ltd v. Darcueil Duncan</u>	(Trinidad & Tobago)	30 April 2025	Lawyer	Implied	7 non-existent or misrepresented cases
Source: <u>Natural & Artificial Intelligence in Law</u>					
<u>Gustafson v. Amazon.com</u>	D. Arizona (USA)	30 April 2025	Pro Se Litigant	Implied	One fake case
<u>Moales v. Land Rover Cherry Hill</u>	D. Connecticut (USA)	30 April 2025	Pro Se Litigant	Unidentified	Misrepresentation of several key federal securities law precedents

Case	Court / Jurisdiction	Date ▼	Party Using AI	AI Tool	Nature of Hallucination
<u>Anonymous v. Anonymous</u>	Israel (Israel)	29 April 2025	Lawyer	Implied	At least five non-existent Israeli family court decisions, with fictitious file numbers and invented citations
<u>Simpson v. Hung Long Enterprises Inc.</u>	B.C. Civil Resolution Tribunal (Canada)	25 April 2025	Pro Se Litigant	Unidentified	Fictitious citations
<u>Benjamin v. Costco Wholesale Corp</u>	E.D.N.Y. (USA)	24 April 2025	Lawyer	ChatOn	Five fabricated case citations, and quotations
<u>Nichols v. Walmart</u>	S.D. Georgia (USA)	23 April 2025	Pro Se Litigant	Implied	Multiple fictitious legal citations
<u>Brown v. Patel et al.</u>	S.D. Texas (USA)	22 April 2025	Pro Se Litigant	Unidentified	5 non-existent cases and misrepresentation of three others
<u>Ferris v. Amazon.com Services</u>	N.D. Mississippi (USA)	16 April 2025	Pro Se Litigant	ChatGPT	7 fictitious cases
<u>Sims v. Souily-Lefave</u>	D. Nevada (USA)	15 April 2025	Pro Se Litigant	Implied	Fake citations
<u>Vilmar Martins dos Santos v. State of Parana</u>	Parana State (Brazil)	11 April 2025	Lawyer	Implied	Full appeal brief generated by AI tools, included the judges' names
<u>Bevins v. Colgate-Palmolive Co.</u>	E.D. Pa. (USA)	10 April 2025	Lawyer	Unidentified	2 fake case citations and misstatements
<u>Puerto Rico Soccer League NFP, Corp., et al. v. Federación Puertorriqueña de Fútbol, et al.</u>	D.C. Puerto Rico (USA)	10 April 2025	Lawyer	Unidentified	Fabricated citations, false quotes, and misrepresented precedents
Bischoff v. South Carolina Department of Education	Admin Law Court, S.C. (USA)	10 April 2025	Pro Se Litigant	Implied	Fake citations
Shekartz v. Assuta Ashdod	Israel (Israel)	7 April 2025	Lawyer	Implied	25 fake citations

Case	Court / Jurisdiction	Date ▼	Party Using AI	AI Tool	Nature of Hallucination
Ltd					
<u>Ayinde v. Borough of Haringey</u>	High Court (UK)	3 April 2025	Lawyer	Unidentified	5 fabricated citations
<u>Zzaman v. HMRC</u>	(UK)	3 April 2025	Pro Se Litigant	Implied	Case cited that did not provide authority for the propositions that were advanced
<u>Daniel Jaiyong An v. Archblock, Inc.</u>	Delaware Chancery (USA)	3 April 2025	Pro Se Litigant	Implied	At least three fabricated or misattributed case citations and multiple false quotations
<u>Dehghani v. Castro</u>	New Mexico DC (USA)	2 April 2025	Lawyer	Unidentified	At least 6 entirely fictitious case citations in a habeas corpus filing
<u>Mazurek et al. v. Thomazoni</u>	Parana State (Brazil)	2 April 2025	Lawyer	ChatGPT	Multiple fictitious court decisions
<u>D'Angelo v. Vaught</u>	Illinois (USA)	2 April 2025	Lawyer	Archie (Smokeball)	Fabricated citation
<u>SQBox Solutions Ltd. v. Oak</u>	BC Civil Resolution Tribunal (Canada)	31 March 2025	Pro Se Litigant	Implied	Wrong quotes, fabricated citation
<u>McKeown v. Paycom Payroll LLC</u>	W.D. Oklahoma (USA)	31 March 2025	Pro Se Litigant	Implied	Several fake citations
<u>Sanders v. United States</u>	Fed. claims court (USA)	31 March 2025	Pro Se Litigant	Implied	5 fabricated citations
<u>AQ v. BT</u>	CRT (Canada)	28 March 2025	Pro Se Litigant	Implied	Fabricated citations and misrepresented precedent
<u>LYJ v. Occupational Therapy Board of Australia</u>	Queensland (Australia)	26 March 2025	Pro Se Litigant	ChatGPT	At least one fabricated case citation, verified by the Tribunal as non-existent
Source: <u>Natural & Artificial Intelligence in Law</u>					
<u>Kruglyak v. Home Depot U.S.A., Inc.</u>	W.D. Virginia (USA)	25 March 2025	Pro Se Litigant	ChatGPT	Multiple fictitious case citations and misrepresentations

Case	Court / Jurisdiction	Date ▼	Party Using AI	AI Tool	Nature of Hallucination
Anonymous v. Anonymous	Israel (Israel)	24 March 2025	—		Fabricated citations
<u>Buckner v. Hilton Global</u>	W.D. Kentucky (USA)	21 March 2025	Pro Se Litigant	Implied	At least 2 fake citations
<u>Williams v. Capital One Bank</u>	D. DC (USA)	18 March 2025	Pro Se Litigant	CoCounsel	Multiple fictitious legal authorities
<u>Alkuda v. McDonald Hopkins Co., L.P.A.</u>	N.D. Ohio (USA)	18 March 2025	Pro Se Litigant	Implied	Fake Citations
<u>Stevens v. BJC Health System</u>	Missouri CA (USA)	18 March 2025	Pro Se Litigant	Implied	6 fabricated citations
Condominium v. Lati Initiation and Construction Ltd	Israel (Israel)	17 March 2025	—	Implied	Three fake citations
<u>LMN v. STC (No. 2)</u>	(New Zealand)	17 March 2025	Pro Se Litigant	Implied	1 fabricated citation
<u>Reddan & An Bord Pleanála v. Trustees of Nenagh Golf Club</u>	(Ireland)	13 March 2025	Pro Se Litigant	Unidentified	Pseudolegal and irrelevant submissions
<u>A v. B</u>	Florence (Italy)	13 March 2025	Lawyer	ChatGPT	Fabricated case law citations
<u>210S LLC v. Di Wu</u>	Hawaii (USA)	11 March 2025	Pro Se Litigant	Implied	Fictitious citation and misrepresentation
<u>Sheets v. Presseller</u>	M.D. Florida (USA)	11 March 2025	Pro Se Litigant	Implied	Allegations by the other party that brief was AI-generated
<u>Arnaoudoff v. Tivity Health Incorporated</u>	D. Arizona (USA)	11 March 2025	Pro Se Litigant	ChatGPT	Fake citations
<u>Nguyen v. Wheeler</u>	E.D. Arkansas (USA)	3 March 2025	Lawyer	Implied	4 fictitious case citations, with fabricated quotes
<u>Ahmad Harsha v. Reuven Bornovski</u>	(Israel)	2 March 2025	Lawyer	Implied	Fabricated citations

Case	Court / Jurisdiction	Date ▼	Party Using AI	AI Tool	Nature of Hallucination
<u>Dog Rights v. Ministry of Agriculture</u>	High Court (Israel)	28 February 2025	Lawyer	Imploded	Numerous fabricated legal citations and case law authorities
<u>Bunce v. Visual Technology Innovations, Inc.</u>	E.D. Pa. (USA)	27 February 2025	Lawyer	ChatGPT	2 fake case citations + citation of vacated and inapposite cases.
<u>Merz v. Kalama</u>	W.D. Washington (USA)	25 February 2025	Pro Se Litigant	Unidentified	Wrong legal advice
<u>Wadsworth v. Walmart (Morgan & Morgan)</u>	Wyoming (USA)	24 February 2025	Lawyer	Internal tool (ChatGPT)	8 of 9 Fake/Flawed Cases
<u>Plonit v. Sharia Court of Appeals</u>	High Court (Israel)	23 February 2025	Lawyer	Unidentified	36+ Flawed/Fake Citations
<u>Unnamed Brazilian litigant</u>	(Brazil)	18 February 2025	Lawyer	ChatGPT	Multiple fabricated case citations and doctrinal references
<u>Saxena v. Martinez-Hernandez et al.</u>	D. Nev. (USA)	18 February 2025	Pro Se Litigant	Implied	At least two fabricated citations.
<u>Geismayr v. The Owners, Strata Plan KAS 1970</u>	Civil Resolution Tribunal (Canada)	14 February 2025	Pro Se Litigant	Copilot	Ten fabricated citations
<u>Goodchild v State of Queensland</u>	Queensland Industrial Relations Commission (Australia)	13 February 2025	Pro Se Litigant	"Internet searches"	Fabricated citation
<u>Luck v Commonwealth of Australia</u>	Federal Court (Australia)	11 February 2025	—		Non-existent legal authorities

Case	Court / Jurisdiction	Date ▼	Party Using AI	AI Tool	Nature of Hallucination
<u>QWYN and Commissioner of Taxation</u>	Administrative Review Tribunal of Australia (Australia)	5 February 2025	Lawyer	Copilot	Copilot, generated a fabricated paragraph from a legal guidance.
<u>Valu v. Minister for Immigration and Multicultural Affairs</u>	(Australia)	31 January 2025	Lawyer	ChatGPT	16 non-existent court cases, and fabricated quotes
<u>Gonzalez v. Texas Taxpayers and Research Association</u>	W.D. Texas (USA)	29 January 2025	Lawyer	Lexis Nexis's AI	Fabricated citation(s), false quotes, misrepresented precedents
<u>Olsen v Finansiell Stabilitet</u>	High Court (UK)	25 January 2025	Pro Se Litigant	Implied	One fake legal case and summary
Source: <u>Natural & Artificial Intelligence in Law</u>					
<u>Body by Michael Pty Ltd and Industry Innovation and Science Australia</u>	Administrative Review Tribunal (Australia)	24 January 2025	Pro Se Litigant	ChatGPT	Fabricated references to non-existent cases (withdrawn prior to the hearing)
<u>Fora Financial Asset Securitization v. Teona Ostrov Public Relations</u>	NY SC (USA)	24 January 2025	Lawyer	Implied	Several fake citations, 1 fake quotation
<u>Strike 3 Holdings LLC v. Doe</u>	C.D. California (USA)	22 January 2025	Lawyer	Ulokued	3 entirely fictitious cases
<u>Arajuo v. Wedelstadt et al</u>	E.D. Wisconsin (USA)	22 January 2025	Lawyer	Unidentified	Multiple non-existent cases
<u>Candice Dias v Angle Auto Finance</u>	Fair Work Commission (Australia)	20 January 2025	Pro Se Litigant	Implied	Fabricated citations
<u>United States v. Hayes</u>	E.D. Cal. (USA)	17 January 2025	Federal Defender	Unidentified	One fake case citation with fabricated quotation
Source: <u>Volokh</u>					
<u>Strong v. Rushmore Loan Management Services</u>	D. Nebraska (USA)	15 January 2025	Pro Se Litigant	Implied	“highly suspicious” signs of generative AI use
<u>O'Brien v. Flick and Chamberlain</u>	S.D. Florida (USA)	10 January 2025	Pro Se Litigant	Implied	2 fabricated citations
<u>Kohls v. Ellison</u>	Minnesota (USA)	10 January 2025	Expert	GPT-4o	Fake Academic Citations

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<i>Source: Volokh</i>					
Mavundla v. MEC	High Court (South Africa)	8 January 2025	Lawyer	Implied	At least 7 non-existent or irrelevant cases
Buckeye Trust v. PCIT	(India)	30 December 2024	Judge	Implied	4 fabricated citations, case misrepresentation that made their way into the Judgment
Al-Hamim v. Star Hearthstone	Colorado (USA)	26 December 2024	Pro Se Litigant	Unidentified	8 Fake Cases
Duarte v. City of Richmond	British Columbia Human Rights Tribunal (Canada)	18 December 2024	Pro Se Litigant	Implied	Fabricated citations
Letts v. Avidien Technologies	E.D. N. Carolina (USA)	16 December 2024	Pro Se Litigant	Implied	Multiple non-existent or misattributed court decisions
Mojtabavi v. Blinken	C.D. California (USA)	12 December 2024	Pro Se Litigant	Unidentified	Multiple fake cases
Hamdan v. the National Insurance Institute	Magistrate Court (Israel)	12 December 2024	Lawyer	Unidentified	Ten non-existent Israeli court decisions
Crypto Open Patent Alliance v. Wright (1)	High Court (UK)	6 December 2024	Pro Se Litigant	Unknown	Multiple fabricated case law citations
Carlos E. Gutierrez v. In Re Noemi D. Gutierrez	Fl. 3rd District CA (USA)	4 December 2024	Pro Se Litigant	Unidentified	Numerous fabricated Florida case citations with invented quotations
Rubio v. District of Columbia DHS	D.C. DC (USA)	3 December 2024	Pro Se Litigant	Unidentified	At least four fabricated case citations
Gauthier v. Goodyear Tire & Rubber Co.	E.D. Tex. (USA)	25 November 2024	Lawyer	Claude	Two nonexistent cases + multiple fabricated quotations

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<u>Leslie v. IQ Data International</u>	N.D. Georgia (USA)	24 November 2024	Pro Se Litigant	Implied	Citation to nonexistent authorities
<u>Wikeley v. Kea Investments Ltd</u>	(New Zealand)	21 November 2024	Pro Se Litigant	Unidentified	Fabricated citations
<u>Monster Energy Company v. Pacific Smoke International Inc.</u>	Canadian Intellectual Property Office (Canada)	20 November 2024	Lawyer		Fabricated citation
<u>Berry v. Stewart</u>	D. Kansas (USA)	14 November 2024	Lawyer	Unidentified	Fabrication citations, and wrong reference to case's evidence
Vargas v. Salazar	S.D. Texas (USA)	1 November 2024	Pro Se Litigant	Implied	Fake citations
<u>Churchill Funding v. 732 Indiana</u>	SC Cal (USA)	31 October 2024	Lawyer	Implied	Two fabricated citations
Source: <u>Volokh</u>					
<u>Mortazavi v. Booz Allen Hamilton, Inc.</u>	C.D. Cal. (USA)	30 October 2024	Lawyer	Unidentified	1 fake case + fabricated factual allegations.
<u>Matter of Weber</u>	NY County Court (USA)	10 October 2024	Expert	MS Copilot	Unverifiable AI Calculation Process
<u>Jones v. Simploy</u>	Missouri CA (USA)	24 September 2024	Pro Se Litigant	Implied	Fake citations
<u>Martin v. Hawai</u>	D. Hawaii (USA)	20 September 2024	Pro Se Litigant	Unidentified	Many fictitious citations
<u>Anonymous Spanish Lawyer</u>	Tribunal Constitucional (Spain)	9 September 2024	Lawyer	Unidentified	19 fabricated Constitutional Court decisions
<u>Transamerica Life v. Williams</u>	D. Arizona (USA)	6 September 2024	Pro Se Litigant	Implied	Fake citations
<u>Rule v. Braiman</u>	N.D. New York (USA)	4 September 2024	Pro Se Litigant	Implied	Fake citations
<u>USA v. Michel</u>	D.C. (USA)	30 August 2024	Lawyer	EyeLevel	Misattributed Song
<u>In re Dayal</u>	(Australia)	27 August 2024	Lawyer	LEAP	Entire list of fictitious legal authorities and case summaries

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<u>Rasmussen v. Rasmussen</u>	California (USA)	23 August 2024	Lawyer	Implied	3 miscited cases and 4 non-existent ones
<u>Nitzan v. Adar BaEmakim Properties Ltd.</u>	Magistrate Court (Israel)	13 August 2024	Lawyer	Implied	Multiple fictitious quotations from alleged Supreme Court decisions
<i>Source: <u>AI4Law</u></i>					
<u>N.E.W. Credit Union v. Mehlhorn</u>	Wisconsin C.A. (USA)	13 August 2024	Pro Se Litigant	Implied	At least four fictitious cases
<u>Industria de Diseño Textil, S.A. v. Sara Ghassai</u>	Canadian Intellectual Property Office (Canada)	12 August 2024	Lawyer	Implied	Fabricated citation
<u>Mr D Rollo v. Marstons Trading Ltd</u>	Employment Tribunal (UK)	1 August 2024	Pro Se Litigant	ChatGPT	Purported expert evidence on technical feasibility of data extraction
<u>Dukuray v. Experian Information Solutions, Inc.</u>	S.D.N.Y. (USA)	26 July 2024	Pro Se Litigant	Unidentified	3 fake case citations and fabricated case law descriptions
<u>Joe W. Byrd v. Woodland Springs HA</u>	Texas CA (USA)	25 July 2024	Pro Se Litigant	Unidentified	Several garbled or misattributed case citations and vague legal references
<u>Iovino v. Michael Stapleton Associates, Ltd.</u>	Western Virginia (USA)	24 July 2024	Lawyer	Claude + Westlaw / LexisNexis	2 fake cases + fabricated quotations attributed to real cases
<u>Anonymous v. NYC Department of Education</u>	S.D.N.Y. (USA)	18 July 2024	Pro Se Litigant	Unidentified	Several nonexistent case citations and fabricated quotations
<u>Lakaev v McConkey</u>	Supreme Court of Tasmania (Australia)	12 July 2024	Pro Se Litigant	Implied	Misrepresented precedent and fabricated citation
<u>X BV in Z v. Tax Inspector</u>	The Hague CA (Netherlands)	26 June 2024	Lawyer	ChatGPT	Use of ChatGPT-generated list of alleged "economically comparable vehicles" to support tax valuation claims
<u>Dowlah v. Professional Staff Congress</u>	NY SC (USA)	30 May 2024	Pro Se Litigant	Unidentified	Several non-existent cases

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<u>Plumbers & Gasfitters Union v. Morris Plumbing</u>	E.D. Wisconsin (USA)	18 April 2024	Lawyer	Implied	1 fake citation
<u>Grant v. City of Long Beach</u>	9th Cir. CA (USA)	22 March 2024	Lawyer	Unidentified	2 Fake Cases, plus flawed summaries
<u>Michael Cohen Matter</u>	SDNY (USA)	20 March 2024	Pro Se Litigant	Google Bard	3 fake cases
<u>Martin v. Taylor County</u>	N.D. Texas (USA)	6 March 2024	Pro Se Litigant	Implied	Fake citations
<u>X BV in Z v. Tax Inspector</u>	The Hague CA (Netherlands)	5 March 2024	Lawyer	ChatGPT	Use of ChatGPT outputs as evidence without clarity about prompts or verification; no fake cases cited, but reliance on unverifiable AI outputs for valuation arguments
<u>Zhang v. Chen (Chong Ke Matter)</u>	(Canada)	23 February 2024	Lawyer	ChatGPT	2 Fake Cases
<u>Kruse v. Karlen</u>	Miss. CA (USA)	13 February 2024	Pro Se Litigant	Unidentified	At least twenty-two fabricated case citations and multiple statutory misstatements.
<u>Smith v. Farwell</u>	Massachusetts (USA)	12 February 2024	Lawyer	Unidentified	3 fake cases
<u>Park v. Kim</u>	2nd. Cir. CA (USA)	30 January 2024	Lawyer	ChatGPT	One fake case citation in appellate briefing
<u>Matter of Samuel</u>	NY Country Court (USA)	11 January 2024	Lawyer	Unidentified	Five flawed citations.
<u>Harber v. HMRC</u>	(UK)	4 December 2023	Pro Se Litigant	Unidentified	9 Fake Tribunal Decisions
<u>Zachariah Crabill Disciplinary Case</u>	Colorado SC (USA)	21 November 2023	Lawyer	ChatGPT	Fake/Incorrect Cases; Lied to Court
<u>Whaley v. Experian Information</u>	S.D. Ohio (USA)	16 November 2023	Pro Se Litigant	Unidentified	Pleadings full of irrelevant info
<u>Mescall v. Renaissance at Antiquity</u>	Westner N.C. (USA)	13 November 2023	Pro Se Litigant	Unidentified	Unspecified concerns about AI-generated inaccuracies

Case	Court / Jurisdiction	Date ▼	Party Using AI	AI Tool	Nature of Hallucination
<u>Morgan v. Community Against Violence</u>	New Mexico (USA)	23 October 2023	Pro Se Litigant	Unidentified	Fake Case Citations
<i>Source: <u>Volokh</u></i>					
<u>Thomas v. Pangburn</u>	S.D. Ga. (USA)	6 October 2023	Pro Se Litigant	Unidentified	At least ten fabricated case citations
<u>Ruggiero et al. v. Lancaster</u>	E.D. Mich. (USA)	11 September 2023	Pro Se Litigant	Unidentified	At least three fabricated case citations
<u>Ex Parte Lee</u>	Texas CA (USA)	19 July 2023	Lawyer	Unidentified	3 fake case citations
<u>Parker v. Forsyth NNO and Others</u>	Magistrates' Court (South Africa)	29 June 2023	Lawyer	ChatGPT	8 fictitious cases
<i>Source: <u>Natural & Artificial Intelligence in Law</u></i>					
<u>Mata v. Avianca, Inc</u>	S.D.N.Y. (USA)	22 June 2023	Lawyer	ChatGPT	6+ Fake Cases, Quotes, Citations; Fake Opinions
<u>Scott v. Federal National Mortgage Association</u>	Maine County (USA)	14 June 2023	Pro Se Litigant	Unidentified	Several fabricated case citations and fake quotations
<u>Nash v. Director of Public Prosecutions</u>	Supreme Court of Western Australia - Court of Appeal (Australia)	8 May 2023	Pro Se Litigant	Implied	Fictitious authorities
<i>Source: <u>Jay Iyer</u></i>					

Mentions Légales, etc, some year (c) .